

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JILL ALTMAN, individually,)	
and on behalf of a class,)	
)	
Plaintiff,)	Civil Action No.
)	1:15-cv-2451-SCJ-JKL
)	
v.)	
)	
WHITE HOUSE BLACK)	
MARKET, INC., and DOES 1-10,)	
)	
Defendant.)	

**UNOPPOSED MOTION TO EXTEND PLAINTIFF'S TIME TO RESPOND TO
DEFENDANT'S OBJECTION TO THE MAGISTRATE'S REPORT AND
RECOMMENDATION REGARDING CLASS CERTIFICATION**

Pursuant to Federal Rule 6(a), Plaintiff moves for a short extension – to December 1st – of her November 22nd due date for responding to Defendant's twenty-five page objection to the report and recommendation ("R&R") regarding Plaintiff's motion for class certification. Good cause exists for this short extension because Plaintiff's counsel's time has been consumed by other work in this case and other cases. The short extension will cause no prejudice or undue delay, and Defendant does not oppose it. In support of this motion, Plaintiff states:

1. On October 25, 2017, this Court issued an R&R in favor of granting Plaintiff's motion for class certification (ECF No. 105).
2. On November 8, 2017, Defendant filed a twenty-five page objection to the

R&R, as permitted by Federal Rule 72 (ECF No. 109).

3. Plaintiff has until November 22, 2017, to file a response to Defendant's objection. *See* Fed. R. Civ. P. 72(b)(2) (when party objects to an R&R on a dispositive matter, non-objecting party may file a response within 14 days); N.D. Ga. L.R. 72.1(B) ("A listing of dispositive motions is contained in 28 U.S.C. § 636(b)(1)."); 28 U.S.C. 636(b)(1)(A) (list includes a decision to grant or deny class certification).

4. Good cause exists to grant Plaintiff an extension of time to prepare her response to Defendant's objection to the R&R because her counsel's time has been and is being consumed by other matters, including:

a. Attending a dispositive motion hearing in *Kuchenmeister v. Healthport Tech.*, No. 17-cv-1001 (N.D. Ga.), on November 13, 2017;

b. Extensive preparation for and conducting multiple out-of-state Rule 30(b)(6) depositions on November 14-16 (including travel), in this case;

c. Attending a multiday conference in Washington D.C. at which counsel is speaking on November 17, 2017; and

d. Drafting a reply in support of a motion to certify a nationwide class in *Lanteri v. Credit Protection Ass'n*, 13-cv-01501 (S.D. Ind.), which is also due November 22, 2017 (after having been previously extended).

5. Plaintiff believes an extension to December 1, 2017, will be sufficient to enable her counsel to prepare her response to Defendant's objection to the R&R.

6. The proposed extension will not cause any prejudice or undue delay.

7. Plaintiff's counsel conferred with Defendant's counsel regarding the proposed extension, and Defendant does not oppose it.

8. Accordingly, for all of the above reasons, Plaintiff's due date to respond to Defendant's objection to the R&R regarding class certification (ECF No. 105) should be extended from November 22, 2017 to December 1, 2017.

Respectfully submitted,

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s/ Michael S. Hilicki
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Plaintiff's Counsel

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1D

Pursuant to Local Rule 7.1D, the undersigned counsel certifies that this document has been prepared using 13 point Book Antigua font.

By: /s/Michael S. Hilicki
An Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which electronically delivered a copy to the parties listed below.

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/s/ Michael S. Hilicki
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